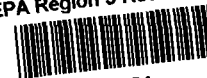


EC
8/13/03

EPA Region 5 Records Ctr.



285171

In The Matter Of
**CLAYTON CHEMICAL D/B/A
RESOURCE RECOVERY GROUP
SUPERFUND SITE, SAUGET, ILLINOIS**

Response To
**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
COMPREHENSIVE ENVIRONMENTAL RESPONSE,
COMPENSATION, AND LIABILITY ACT OF 1980
AS AMENDED, 42 U.S.C. SECTION 106(a)
FORMAL COMMUNICATION OCTOBER 31, 2002
MR. WILLIAM E. MUNO, DIRECTOR SUPERFUND
REGION 5**

Prepared By Philip J. Molé
MOSTARDI PLATT ENVIRONMENTAL
1520 Kensington Road
Suite 204
Oak Brook, Illinois 60523-2139

For
**LYON METAL PRODUCTS, LLC
MONTGOMERY, ILLINOIS**

August 13, 2003

Mostardi Platt

be permitted by USEPA IEPA to accept spent solvents for distillation recovery applications. The toluene (CAS 108-88-3) returned to Lyon in commerce bill of lading on a quick turnaround basis. The resin residue shipped off-site for energy recovery in a permitted cement kiln facility. The material was reclaimed, the residue combusted to recover energy in accordance with state of Illinois EPA regulations sections 721.106(2)(b) and 721.102(c)(2) Title 35, subtitle g for exemptions (exhibit).

2. Lyon is not seeking a full-scale *de minimis* ranking of all the PRPs, but requests special case by case consideration for its conservation effects in conforming to the spirit and intent of the RCRA and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), which states, **“a person who arranged for recycling of recyclable material shall not be liable under sections 9607(a)(3) and 9607(a)(4) of the title with respect to such material.”**
 - (A) The recyclable material met a commercial specification
 - (B) A market existed for the recyclable material was made available for a feedstock saleable product.
 - (C) The feedstock was combusted in a permitted cement kiln.
3. An on-site due diligence inspection was conducted by Sun Eco Systems, Inc. (Sun Eco) to ascertain the regulatory compliance in 1997. Sun Eco instructed the operational personnel to process the paint flush immediately upon receipt through the distillation process, and returned to Lyon, utilizing the commercial bill of lading. RRG was instructed *not* to combine and/or mix any other solvent chlorinated classifications with the Lyon aromatic product. All Lyon drums were labeled for identification. A certificate of destruction was issued to Lyon, on a quick turnaround procedure. The compliance procedure insured a brief residence at RRG. Continued surveillance was conducted of the RRG site, which indicated on-going problems.
4. As requested by sun eco, based on 125 unresolved IEPA violations, non-compliance with consent orders, and on-site due diligence conducted on two (2) separate investigations, Lyon discontinued utilizing RRG/Clayton chemical in 1997 while still an operating permitted facility. No shipments were conducted 1998.

WASTE IN RRG

1. A review of the waste in list procured from the USEPA of the RRG site indicated a final volumetric ranking dated February 25, 2002, for Lyon of about 161,000 gallons representing a 7.32 percentile. The spent solvent was for recycling and returned. Lyon does not characterize this product as a hazardous waste but a return on the original investment, a valuable resource conservation management effort. The content of the spent solvent is estimated at 5 to 10% resin, 90 to 95% solvent toluene. Estimating a 90% distillation efficiency:

$$\begin{array}{rcl} 161,000 & \text{Gallons} & \\ -16,000 & = 10\% \text{ resin} & \\ \hline 144,900 & = \text{gallons solvent toluene} & \end{array}$$

$$\begin{array}{rcl} 144,900 & & \\ -14,490 & \text{Less 10\% resin residue} & \\ \hline 130,410 & \text{Gallons toluene} & \end{array}$$

Based on the above, Lyon is requesting that proper credits be issued for its regulatory efforts and that Lyon be reclassified as a *de minimis* participant contributor in the adjusted volumetric rank of 14,490 gallons (exhibit).

2. Superfund recycling equity, provided: “**the purpose in enacting this section are to promote the reuse and recycling to remove the disincentives and impediments to recycling created as an unintended consequence of the 1980 superfund liability provision.**” (42 USC chapter 103 – CERCLA).
3. Pleaded be advised that the IEPA annual hazardous waste reports do not indicate that Lyon product was returned as recycled material and/or was made available for use as a feedstock for the manufacture of new saleable product. The still bottoms utilized for energy recovery (Title 35 – subtitle g: sections 721.01(c)(4)(5)). Exemption.

INSPECTION AUDITS BY USEPA AND IEPA

1. On-site inspections were conducted by IEPA USEPA on five occasions. In each instance, *no Lyon drums* were identified. This was due to the fact that the aromatic solvent product was *not* mixed with other waste substances but processed quickly and returned to Lyon as

recycled solvent under a bill of lading. Lyon purchased the recycled solvent in commerce from EWS.

2. The Roy F. Weston, inc. (Weston) and Project Resources, Inc. (PRI) were retained under USEPA superfund technical assessment and Response Team (START) contract 68-w-00-19 to perform a removal site evaluation of drums, tanks, containers, sampling and reviewing the analytical data at the RRG site. All HAZCAT activities were conducted under the authority of the USEPA on-scene coordinator on *June 5 through 7, 2001*. The drum team verified drums, containers, various sized and shaped tanks, miscellaneous throughout the property. The drum team inventory summaries were found in Table 4-9 through 4-12 of the report. A review of the tables and drum dock building inventory survey did *not* indicate or identify Lyon product or drums at the site (exhibit).
3. There were no Lyon drums left at the site when RRG took control in 1996 from Clayton chemical.
4. On *May 28, 2002*, Enviro-Vac, Jacksonville, Illinois, submitted a bid proposal to the PRP participation group to remove the liquid waste inventory. The scope of work (SOW) included hazardous bulk liquid removal, non-hazardous bulk liquid removal, tank cleaning, sludge removal, and drums. The drum storage area did *not* identify any Lyon product or drums at the site (exhibit). Lyon did not ship oily wastewater.
5. On *May 13 and 14, 1997*, a multi-media inspection was conducted at the subject facility. Participating in the inspection was the USEPA, IEPA, and the American bottoms regional wastewater treatment plant. A RCRA Part b permit was issued effective may 8, 1996, was in effect to perform solvent recovery and waste fuel blending. The inspection did *not* identify any Lyon drums for processing.
6. In summary, in all of the drum inventories and multi-agency investigations, no Lyon product drums were identified which technically supports Lyon's claim that it had little or no environmental impact at the RRG site, including the June 18, 2002 inspection.

BEST PUBLIC INTEREST (CERCLA 42 USC SECTION 4622)

1. As discussed with members of your staff, Lyon believes that in the best public interest, it *did join* and fully cooperate with the PRP participating group. Further offered services to the technical, search, and administrative committees. We regret to inform USEPA that cooperation was *not* reciprocal. No response to: letters of transmittal, facsimiles, telephone

calls, inquiries, etc. Over a protracted period of time. Lyon was *not* able to participate and/or have input and/or impact of the working PRP group. No bidding on the cleanup. The RFP proposal submitted by O'Brien and Gere (OBG) was in my opinion excessive, and the remediation costs 60% to 80% too high. It was apparent Lyon would not have representation, nor did we feel comfortable with the Administrative Order of Consent (AOC) as a result.

2. The following transmittal were sent to the various key players:

- Mr. Tom Turner, Assistant Regional Council, USEPA Superfund Section, on September 17, 2002 – exhibit
- Ms. Margaret A. Coughlin, Dickerson Wright, on August 28, 2002 – exhibit
- Ms. Janet Haynes, Nascote-Technical Committee, on September 30, 2002 – exhibit
- Ms. Margaret A. Coughlin - Administration, on August 28, 2002 – exhibit

No response.

3. In the review and evaluation of the Request For Proposal (RFP) submitted by environmental consultants OBG that the OBG SOW should include and consider several technical cost saving techniques presented to save the PRP participating group approximately 60% to 80% of the cleanup costs. Under CERCLA section 9621 (cleanup standards) cost effective response (sec. 9604 and 9606) states: **“remedial actions in which treatment which permanently and significantly reduces the volume, toxicity or mobility of the hazardous substances, pollutants and contaminants, is a principal element, are to be preferred over remedial actions not involving such treatments.”** It was recommended that decanting, centrifuge, reclamation, Btu energy recovery utilized. There was no response from PRP group technical committee to our proposal for remediation and/or bidding. OBG was retained to conduct the conventional, expensive disposal procedures weeks prior to the AOC order. Lyon was foreclosed on these proceedings.
4. On November 12, 2002, Mr. Kevin turner (USEPA) OSC was contacted restating and detailing our position on justification for delisting/*de minimis* category and the cost-effective treatments. Mr. Turner responded, **“doesn’t care how much cleanup costs are – even if \$100 million. Not USEPA’s money, doesn’t care whether Lyon is participating or not, doesn’t care if job can be done or not for less money – not interested.”** Stated AOC signed by PRP group and OBG over six (6) weeks ago, early September. No bidding conducted. OBG was the environmental/remediation contractor for Daimler Chrysler over the past years. Lyon was not able to participate. Recommendations submitted – no response.

5. On October 8, 2002, discussed the merits for considering a delisting/*de minimis* classification with Ms. Meg Coughlin, PRP coordinator, based on material recycled and energy conservation recovery. Additionally, Mr. Molé of MPE stated that he would like to contribute his time, efforts, and experience to reduce substantially the cleanup costs as presented to the PRP technical committee, Ms. Janet Haynes, which could save up to 80% for PRPs—no response from Ms. Meg Coughlin and/or the technical committee. Lyon was not able to participate. Cleanup contract awarded to OBG six weeks earlier at excessive cost. No response.

HISTORY AT THE SITE

1. Over a protracted period of time (1950 to 1998), the site (RRG) was utilized by a multiplicity of S.I.C. groups, all of which involved those compounds of concern (COCs), which have impacted and contributed to the contamination and potential release which currently exists at the site. It is not reasonable, logical or equitable to arbitrarily pursue remedy from the PRPs involved for the brief time frame period 1995 through 1998. This represents only a small percentage of the thousands of potential responsible parties over a span of 50 years. Under CERCLA, cleanup liability includes: present owners, past owners, lessor, commercial brokers, lessees, lenders, corporate executives, transporter, environmental brokers, etc. Not to include the fact that there are 14 superfund sites on the perimeter and directly adjacent to the RRG site, which have also impacted the facility. The overall cleanup strategy should include all contributors to the liquid and soil remediation. This will minimize the overall cost of the group.
2. GM&O railroad utilized the site as maintenance yard – paints/solvents/oils/PCB fluids, etc. 1940 to 1950 – potential PRPs not listed.
3. Still bottoms & disposal pit company utilized the site for spent residue dump – 1960 – potential PRPs not listed.
4. In 1961, Clayton Chemical Company leased the facility to recycle and recover used solvents and waste prior to the advent of the federal regulations – potential PRPs not listed.
5. On May 12, 1981, the village of Sauget deeded the property to Clayton Chemical Company. In November of 1996 discontinued operations due to insolvency – potential PRP not listed.
6. Between 1996 and 1998, the RRG was allowed to operate by IEPA in spite of the 123 violations and in default of the consent order of 1995. The group consisted of owners with

environmental backgrounds from existing environmental companies; all potential PRPs (owners) not listed.

- Environmental Operations Industries, St. Louis – Mr. Hopson (owner)
- Emerald Environment, St. Louis, Mr. Lee (owner)
- Specialty Waste Services, Alton, IL – Mr. G. Snider (owner)
- Environmental Assets – Mr. Cartel (owner)
- Northwest Chemical (1991) (owner)
- Environmental Waste Systems, Aurora – (broker)
- Philips Pipe Line Cleaners
- Clark Oil & Refining, IL
- Schiber Truck
- En-Clean Transport
- Schiber Truck
- Enviroqual – Mr. Fred Lee (owner)
- Cahokia Marine Service – potential PRP not listed
- TWI – CERCLA potential PRP not listed
- A-1 Oil Company - potential PRP not listed
- American Bottoms - potential PRP not listed
- Sauget Wastewater Plant - potential PRP not listed
- Krummrich Plant - potential PRP not listed
- Union Electric - potential PRP not listed
- Amax Zinc - potential PRP not listed
- Monsanto Co. - potential PRP not listed
- State of Illinois - potential PRP not listed
- Ethyl Petroleum Additives - potential PRP not listed
- Southwest Transfer Station - potential PRP not listed
- Superior Solvents - potential PRP not listed
- Ralston Purina - potential PRP not listed
- Russel Bliss - potential PRP not listed
- Falling Rock Road Dump - potential PRP not listed
- Ozinga Transport - potential PRP not listed
- USEPA - potential PRP not listed

7. On May 12, 1982, the Sauget task force was formed to investigate the regional problem. Contributors to the contamination of soil leachate and groundwater were found to be

Monsanto Chemical, Sauget toxic dump, Sauget P.O.T.W. sludge lagoons, Krummrich landfill. All were sources to the Mississippi river bank. All potential PRPs not listed.

8. On March 18, 1988, Mr. Lawrence Easter, IEPA, wrote to Mr. Jim Mayka of USEPA stating, **"this site (RRG) can in no way be construed to represent the sole source of groundwater contamination, but the site's potential as a contributing source should not be downplayed."**

9. A site assessment executive summary conducted in June 1982 by IEPA, USEPA states: **"Clayton chemical co. Has operated a solvent and oil recycling business at this location since 1961. Waste streams handled in this process include F002, F003 and F005. Through leases, trade waste incinerators (TWI.) And Russel Bliss/A-1 Oil Corp. Have also done business at this location. TWI. Operated a hazardous waste incinerator on Clayton property until late 1982, and bliss/bliss/a-1 maintains 4 waste oil storage tanks at this location. TWI. And bliss/bliss/a-1 will be addressed in separate preliminary assessments.**

"Soil contamination potential would appear inherent with this industry. Groundwater contamination has been verified by analysis of an on-site well sample taken 6/22/82."

"A medium priority has been assigned to this site because of its association with two other known hazardous waste sites. Because of the dense industrialization of the immediate area and no verifiable use of groundwater, a low priority would appear adequate were it not for the TWI., bliss/bliss/a-1 association." — potential PRPs not listed.

10. On November 21, 2002, MPE (Molé) directed a letter to USEPA superfund's attention as it concerns the 50-year overall historical environmental catastrophe of the region and requested the following:

"As provided in the hazardous substance pollution contingency plan (NCR) 40 CFR – section 300.415, it is incumbent upon the lead agency to conduct an engineering/evaluation/cost analysis (EE/CA) of alternatives which take into full consideration of the total regional remediation area which there exist numerous superfund sites which all directly and/or indirectly have impacted the soil, air, and groundwater over a 50-year period. All of these off-site facilities go beyond the scope of work of the RRG site." No response.

11. In all instances, Lyon legitimately managed its spent solvent within the state/federal regulations. In essence, the PRPs are paying for the owner/operator *mishandling* of hazardous

substance. Additionally, *are not* listed as the primary responsible parties, along with other major contributors, governmental agencies, villages and municipalities, large corporations, plus thousands of generators over a span of approximately 50 years.

12. The site was permitted in a 100-year flood plain by the IEPA, which, as a result, contributed to the contamination. The total region is a superfund cleanup and should logically and legally include all potential PRPs as well as SQGs.
13. MPE (Molé) believes the above comments deserve consideration and are consistent with the spirit and intent of the RCRA reforms to streamline the CERCLA investigate/closure process by focusing directly on the primary risk factors for regional corrective action, thereby reducing substantially the costs. These comments are offered in the spirit of cooperation and fairness.
14. On September 17, 2002, Mr. Tom Turner, Assistant Regional Counsel, was faxed a request to provide copies of the engineering evaluation (cost) (EECA) of removal alternatives for the liquid phase – no response.
15. Although USEPA has performed a basic volumetric ranking of the records of IEPA, due to the fact it only lists a very limited number of PRP's, it is not equitable in sorting out relative liability between the PRPs, the United States and the State of Illinois. The site is an environmental justice concern, due to the perimeter and adjacent areas within one mile of the site to be cleaned up are demographically composed of a primarily minority and impoverished populace.
16. There is some documentary information suggesting that the United States and the State of Illinois may have contributed amounts of waste materials at the site. Neither entities are named as PRPs.

As discussed with you and members of your staff, due to the current poor economic climate, Lyon finds itself in a precarious financial posture from foreign competition. Also, understand Lyon is a major employer in the Montgomery area. Lyon, therefore, respectfully requests the facts presented for the delisting and/or credit adjustment of the total gallons volumetric ranking for waste out (recycled material) for a total of 14,490 gallons volumetric ranking. Lyon is amenable to paying its share percentage adjusted to 0.55%

MPE (Molé) does not believe Lyon should be included or liable for the soil/groundwater cleanup, which the history and record conclusively indicates was contaminated by COCs which existed over 50 years ago. These historically responsible parties are not listed as PRPs.

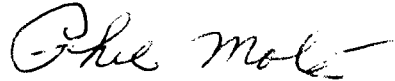
U.S. Environmental Protection Agency
MPE Project M023401
August 13, 2003
Page 11 of 10

(EWS) is liable and took title of spent product, yet is not listed as PRP (exhibit). EWS is a permitted RCRA hazardous waste management facility as defined (35 IAC) 702.110.

Thank you. I look forward to your reply.

Respectfully submitted,

MOSTARDI PLATT ENVIRONMENTAL

A handwritten signature in cursive script, appearing to read "Philip Molé", with a horizontal line extending from the end of the signature.

Philip J. Molé
Vice President

cc: R. P. Washington, Lyon
D. Harrison, Lyon
J. Goslein, Lyon
Pat Kinnelly

Exhibits

EXHIBITS

- USEPA Revised Final Volumetric Ranking, 2/25/2002
- Swans Adjustment – Group Share List
- Environmental Waste Services, Inc., 9/15/1997
- Section 721.106 (c)(2) Title 35 – Subtitle G
- Section 721.101 (c)(2) Title 35 – Subtitle G
- MPE Letter – PRP Group, 8/28/2002
- MPE Letter – USEPA – Superfund Division, 9/27/2002
- MPE Letter – PRP Group, 9/30/2002
- MPE Fax – PRP Group, 10/14/2002
- MPE Letter – PRP Group, 10/21/2002
- Roy F. Weston – Drum Inventory, 6/7/2001
- Enviro-Vac Drum Inventory, 5/28/2002
- MPE Fax Tom Turner, 9/17/2002
- O'Brien & Gere/Daimler-Chrysler Assoc.

EXHIBIT -

Clayton Chemical Site

Revised Final Volumetric Ranking
2/25/02

Notes:

- The Generator Name is the name listed on the Illinois Environmental Protection Agency Hazardous Waste Reports from 1995-1998.
- The Liable Company Name is the current name of the likely generator.
- The LC ID (or Liable Company ID) number represents a unique identification number assigned to individual parties. Individual parties were identified from the party name and address information provided on the Illinois EPA Hazardous Waste Reports. Approximately 900 liable companies were identified. A 10,000 series number was assigned to groups of parties for data organizational purposes only. For example, if one party generated waste from more than one address, that party's wastes were combined and the party was assigned a group number in the 10,000 series. This process permits the historical tracking of the originally assigned LC ID numbers. There are not 10,000 liable companies.
- Conversion information is contained at the end of this list.

LC ID	LIABLE COMPANY NAME	GENERATOR NAME	CALC VOLUME-GALLONS
190	DAIMLERCHRYSLER CORPORATION	CHRYSLER CORP.	541610
562	NASCOTE INDUSTRIES, INC.	NASCOTE INDUSTRIES	368485
495	MALLINCKRODT INC.	MALLINCKRODT CHEMICAL	283639
10	AAD DISTRIBUTION AND DRY CLEANING SERVICES, INC.	AAD DISTRIBUTION AND DRY CLEANING SERVICES, INC.	267637
790	TEVA PHARMACEUTICALS USA, INC.	TEVA PHARMACEUTICALS USA EPC DIVISION	249419
779	THE SWAN CORPORATION	SWAN CORPORATION	229518
489	LYON METAL PRODUCTS, LLC	LYON METAL PRODUCTS INC.	161625
640	PURETHANE, INC. - WHY DROPPED FROM LIST?	PURETHANE, INC.	155163
565	NATIONAL COATINGS INC	NATIONAL COATINGS INC	151135
776	SUPERIOR EQUIPMENT CO., INC.	SUPERIOR EQUIPMENT CO	129413
506	MCINTYRE GROUP, LTD.	MCINTYRE GROUP	84470
767	STERLING LACQUER MANUFACTURING COMPANY	STERLING LACQUER MANUFACTURING COMPANY	71981
490	NORDENIA U.S.A., INC.	M & W PACKAGING USA	66738
61	ARRIS INTERNATIONAL, INC.	ANTEC MANUFACTURING	45197
551	MORTON METALCRAFT	MORTON METALCRAFT	41681
836	LEAR CORPORATION AUTOMOTIVE SYSTEMS	UNITED TECHNOLOGIES AUTOMOTIVE	29194
258	DOW SCREW PRODUCTS	DOW SCREW PRODUCTS	26976
795	KNAPHEIDE EQUIPMENT CO.	THE KNAPHEIDE MANUFACTURING CO	26160
10026	WARECO SERVICE INC.		24841
48	AMBASSADOR BUILDINGS	AMBASSADOR BUILDINGS	22332
10002	ARCHER DANIELS MIDLAND CO.		21839
328	DJR HOLDINGS, INC.		20680
623	BAKER PETROLITE CORPORATION	PETROLITE CORPORATION	19589
459	KOMATSU AMERICA INTERNATIONAL CO.	KOMATSU AMERICA INTERNATIONAL CO.	18009
172	CERRO COPPER PRODUCTS	CERRO COPPER PRODUCTS	17186
819	TRUE MANUFACTURING CO., INC.	TRUE MANUFACTURING	13914
570	NESCO CONTAINER CORPORATION	NESCO	11335
605	PARSONS COMPANY INC	PARSONS INC	10925
441	K & R WOOD PRODUCTS, INC.	K & R WOOD PRODUCTS	10195
35	AGI INCORPORATED - WHY DROPPED FROM LIST?	AGI INCORPORATED	10027
917	QUEST DIAGNOSTICS CLINICAL LABORATORIES, INC.	SMITHKLINE BEECHAM CLINICAL LABORATORIES, INC	10010
614	PENN ALUMINUM	PENN ALUMINUM	9855

UNDELETED
10,000
RCA WASTE

ENFORCEMENT CONFIDENTIAL

2ND LIST 8/8/02

900 Liable Companies identified

EXHIBIT

Initial Version (Before Swan's Reduction)

GROUP VOLUMETRIC SHARE LIST

<u>Company</u>	<u>COLUMN A - Group Gallonge</u>	<u>COLUMN B - Percentage of Group Liability</u>
AGI Incorporated	10027.00	0.45%
Archer Daniels Midland Co. (ADM)	21839.00	0.99%
Arris International, Inc.	45197.00	2.05%
Baker Petrolite Corporation	19589.00	0.89%
Cerro Copper Products	17186.00	0.78%
Daimlerchrysler Corporation	55239.00	2.50%
DJR Holdings, Inc.	20680.00	0.94%
Dow Screw Products	26976.00	1.22%
K&R Wood Products, Inc.	10195.00	0.46%
Knapheide Equipment Co.	26160.00	1.18%
Komatsu America International Co.	18009.00	0.82%
Lear Corporation Automotive Systems	29194.00	1.32%
Lyon Metal Products, LLC	161625.00	7.32%
Mallinckroft, Inc.	283639.00	12.84%
McIntyre Group, Ltd.	84470.00	3.82%
Morton Metal Craft	41681.00	1.89%
Nascote Industries, Inc.	368485.00	16.68%
National Coatings, Inc.	151135.00	6.84%
Nesco Container Corporation	11335.00	0.51%
Nordenia U.S.A., Inc.	66738.00	3.02%
Parsons Company Inc.	10925.00	0.49%
Quest Diagnostics Clinical Laboratories, Inc.	10010.00	0.45%
Sterling Lacquer Manufacturing Company	71981.00	3.26%
Superior Equipment Co., Inc.	129413.00	5.86%
Teva Pharmaceuticals USA, Inc.	249419.00	11.29%
The Swan Corporation	229518.00	10.39%
True Manufacturing Co., Inc.	13914.00	0.63%
Wareco Service Inc.	24841.00	1.12%
TOTAL GALLONS OF GROUP	2209420.00	100.00%



**Environmental
WASTE SERVICES, INC**

September 15, 1997

Robert Gibbons
LYON METAL PRODUCTS
P.O. Box 671
Aurora, IL 60507-0671

Dear Mr. Gibbons:

In response to our phone conversation on September 11, I would like to confirm that the still bottoms generated from the distillation process are sent to a cement kiln as a fuel. Resource Recovery Group will take all of Lyon Metal Products' liquid solvent waste and transfer the solvent into a bulk tank. The solvent is recycled into a reclaimed solvent stream and dirty still bottoms. The reclaimed solvent is sent back to Lyon Metal Products for reuse. The still bottoms are blended into a fuel for the cement kiln. The blended fuel is sent to the cement kiln as Resource Recovery Group's waste.

If you need additional information, please give me a call.

Sincerely,

Sam Erwin

Experts in Waste Management Alternatives

43 W 540 C Main Street Road • Elburn, Illinois 60119 • (630) 365-1100 • FAX (630) 365-3112

the subject to the reduced requirements of this Section may be mixed with non-hazardous waste and remain subject to the reduced requirements even though the resultant mixture exceeds the quantity limitations identified in this Section if the mixture meets any of the characteristics of hazardous wastes identified in Subpart C. If a quantity generator mixes a solid waste with a hazardous waste that exceeds a quantity exclusion level of this Section, the mixture is subject to full regulation. If a small quantity generator's hazardous wastes are mixed with used oil, the mixture is subject to 35 Ill. Adm. Code 720 through 728, if it is destined to be burned for energy recovery. Any material produced from such a mixture by processing, or the treatment is also so regulated if it is destined to be burned for energy recovery.

23 Ill. Reg. 1718, effective January 19, 1999)

Requirements for Recyclable Materials

Materials that are recycled are subject to the requirements for generators, transporters, and storage facilities of 35 Ill. Adm. Code 720 through 728, except for the materials listed in subsections (a)(2) and (a)(3) of this Section. Wastes that are recycled will be known as "recyclable materials". Recyclable materials are not subject to the requirements of this Section but are regulated under 35 Ill. Adm. Code 726 through 728 and all applicable provisions in 35 Ill. Adm. Code 702, 703, and 705. Recyclable materials used in a manner constituting disposal (35 Ill. Adm. Code 726 Subpart C); hazardous wastes burned for energy recovery in boilers and industrial furnaces that are not regulated under 35 Ill. Adm. Code 724 Subpart O or 725 Subpart O (35 Ill. Adm. Code 726 Subpart H); recyclable materials from which precious metals are reclaimed (35 Ill. Adm. Code 726 Subpart F); lead-acid batteries that are being reclaimed (35 Ill. Adm. Code 726 Subpart G). Recyclable materials are not subject to regulation under 35 Ill. Adm. Code 722 through 726, 728, or 702, and are not subject to the notification requirements of section 3010 of the Resource Conservation and Recovery Act. Ethyl alcohol that is reclaimed except that, unless provided otherwise in an international agreement as defined in 35 Ill. Adm. Code 722.158: a person initiating a shipment for reclamation in a foreign country and any intermediary arranging for the shipment shall comply with the requirements applicable to a primary exporter in 35 Ill. Adm. Code 722.153; 722.156(a)(1) through (a)(4), (a)(6), and (b); and 722.157; shall export such materials only upon consent of the receiving country and in conformance with the USEPA Acknowledgment of Consent, as defined in 35 Ill. Adm. Code 722 Subpart E; and shall provide a copy of the USEPA Acknowledgment of Consent to the shipment to the transporter transporting the shipment for export; Transporters transporting a shipment for export shall not accept a shipment if the transporter knows that the shipment does not conform to the USEPA Acknowledgment of Consent, shall ensure that a copy of the USEPA Acknowledgment of Consent accompanies the shipment, and shall ensure that it is delivered to the facility designated by the person initiating the shipment; metal that is not excluded under Section 721.104(a)(13); produced from the refining of oil-bearing hazardous wastes along with normal process streams at a petroleum refining facility if such wastes result from normal petroleum refining, production, and transportation practices (this provision does not apply to fuels produced from oil recovered from oil-bearing hazardous waste where such recovered oil is already excluded under Section 721.104(a)(12)); from refining wastes. Hazardous waste fuel produced from oil-bearing hazardous wastes from petroleum refining, production, or transportation practices or produced from oil reclaimed from such hazardous wastes, where such hazardous wastes are reintroduced into a process that does not use distillation or does not produce products from crude oil, so long as the resulting fuel meets the used oil specification under 35 Ill. Adm. Code 739.111 and so long as no other hazardous wastes are used to produce the hazardous waste fuel; hazardous waste fuel produced from oil-bearing hazardous waste from petroleum refining production, and transportation practices, where such hazardous wastes are reintroduced into a refining process after a point at which contaminants are removed, so long as the fuel meets the used oil fuel specification under 35 Ill. Adm. Code 739.111; and oil reclaimed from oil-bearing hazardous wastes from petroleum refining, production, and transportation practices, which reclaimed oil is burned as a fuel without reintroduction to a refining process, so long as the reclaimed oil meets the used oil fuel specification under 35 Ill. Adm. Code 739.111. Oil that is recycled and is also a hazardous waste solely because it exhibits a hazardous characteristic is not subject to the requirements of 35 Ill. Adm. Code 720 through 728, but it is regulated under 35 Ill. Adm. Code 739. Used oil that includes any used oil that is reused for any purpose following its original use (including the purpose for which the oil was used). Such term includes, but is not limited to, oil that is re-refined, reclaimed, burned for energy recovery, or reprocessed. Waste that is exported to or imported from designated member countries of the Organization for Economic Cooperation and Development (OECD), as defined in Section 722.158(a)(1), for the purpose of recovery is subject to the

721.Appendix J	Method of Analysis for Chlorinated Dibenzo-p-Dioxins and Dibenzofurans (Repealed)
721.Appendix Y	Table to Section 721.138
721.Appendix Z	Table to Section 721.102

AUTHORITY: Implementing Sections 7.2 and 22.4 and authorized by Section 27 of the Environmental Protection Act [415 ILCS 5/7.2, 22.4 and 27].

SOURCE: Adopted in R81-22 at 5 Ill. Reg. 9781, effective May 17, 1982; amended and codified in R81-22 at 6 Ill. Reg. 4828, effective May 17, 1982; amended in R82-18 at 7 Ill. Reg. 2518, effective February 22, 1983; amended in R82-19 at 7 Ill. Reg. 13999, effective October 12, 1983; amended in R84-34, 61 at 8 Ill. Reg. 24562, effective December 11, 1984; amended in R84-9 at 9 Ill. Reg. 11834, effective July 24, 1985; amended in R85-22 at 10 Ill. Reg. 998, effective January 2, 1986; amended in R85-2 at 10 Ill. Reg. 8112, effective May 2, 1986; amended in R86-1 at 10 Ill. Reg. 14002, effective August 12, 1986; amended in R86-19 at 10 Ill. Reg. 20647, effective December 2, 1986; amended in R86-28 at 11 Ill. Reg. 6035, effective March 24, 1987; amended in R86-46 at 11 Ill. Reg. 13466, effective August 4, 1987; amended in R87-32 at 11 Ill. Reg. 16698, effective September 30, 1987; amended in R87-5 at 11 Ill. Reg. 19303, effective November 12, 1987; amended in R87-26 at 12 Ill. Reg. 2456, effective January 15, 1988; amended in R87-30 at 12 Ill. Reg. 12070, effective July 12, 1988; amended in R87-39 at 12 Ill. Reg. 13006, effective July 29, 1988; amended in R88-16 at 13 Ill. Reg. 382, effective December 27, 1988; amended in R89-1 at 13 Ill. Reg. 18300, effective November 13, 1989; amended in R90-2 at 14 Ill. Reg. 14401, effective August 22, 1990; amended in R90-10 at 14 Ill. Reg. 16472, effective September 25, 1990; amended in R90-17 at 15 Ill. Reg. 7950, effective May 9, 1991; amended in R90-11 at 15 Ill. Reg. 9332, effective June 17, 1991; amended in R91-1 at 15 Ill. Reg. 14473, effective September 30, 1991; amended in R91-12 at 16 Ill. Reg. 2155, effective January 27, 1992; amended in R91-26 at 16 Ill. Reg. 2600, effective February 3, 1992; amended in R91-13 at 16 Ill. Reg. 9519, effective June 9, 1992; amended in R92-1 at 16 Ill. Reg. 17666, effective November 6, 1992; amended in R92-10 at 17 Ill. Reg. 5650, effective March 26, 1993; amended in R93-4 at 17 Ill. Reg. 20568, effective November 22, 1993; amended in R93-16 at 18 Ill. Reg. 6741, effective April 26, 1994; amended in R94-7 at 18 Ill. Reg. 12175, effective July 29, 1994; amended in R94-17 at 18 Ill. Reg. 17490, effective November 23, 1994; amended in R95-6 at 19 Ill. Reg. 9522, effective June 27, 1995; amended in R95-20 at 20 Ill. Reg. 10963, effective August 1, 1996; amended in R96-10/R97-3/R97-5 at 22 Ill. Reg. 275, effective December 16, 1997; amended in R98-12 at 22 Ill. Reg. 7615, effective April 15, 1998; amended in R97-21/R98-3/R98-5 at 22 Ill. Reg. 17531, effective September 28, 1998; amended in R98-21/R99-2/R99-7 at 23 Ill. Reg. 1718, effective January 19, 1999; amended in R99-15 at 23 Ill. Reg. 9135, effective July 26, 1999; amended in R00-13 at 24 Ill. Reg. 9481, effective June 20, 2000.

SUBPART A: GENERAL PROVISIONS

Section 721.101 Purpose and Scope

- a) This Part identifies those solid wastes which are subject to regulation as hazardous wastes under 35 Ill. Adm. Code 702, 703, 705 and 722 through 725 and 728, and which are subject to the notification requirements of Section 3010 of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6901 et seq.). In this Part:
 - 1) Subpart A defines the terms "solid waste" and "hazardous waste," identifies those wastes which are excluded from regulation under 35 Ill. Adm. Code 702, 703, 705 and 722 through 726 and 728, and establishes special management requirements for hazardous waste produced by conditionally exempt small quantity generators and hazardous waste which is recycled.
 - 2) Subpart B sets forth the criteria used to identify characteristics of hazardous waste and to list particular hazardous wastes.
 - 3) Subpart C identifies characteristics of hazardous wastes.
 - 4) Subpart D lists particular hazardous wastes.
- b) Limitations on definition of solid waste:
 - 1) The definition of solid waste contained in this Part applies only to wastes that also are hazardous for purposes of the regulations implementing Subtitle C of RCRA. For example, it does not apply to materials (such as non-hazardous scrap, paper, textiles or rubber) that are not otherwise hazardous wastes and that are recycled.
 - 2) This Part identifies only some of the materials which are solid wastes and hazardous wastes under Sections 1004(5), 1004(27) and 7003 of RCRA. A material which is not defined as a solid waste in this Part, or is not a hazardous waste identified or listed in this Part, is still a hazardous waste for purposes of those Sections if, in the case of Section 7003 of RCRA, the statutory elements are established.
- c) For the purposes of Sections 721.102 and 721.106:
 - 1) A "spent material" is any material that has been used and as a result of contamination can no longer serve the purpose for which it was produced without processing.
 - 2) "Sludge" has the same meaning used in 35 Ill. Adm. Code 720.110.
 - 3) A "by-product" is a material that is not one of the primary products of a production process and is not solely or separately produced by the production process. Examples are process residues such as slags or distillation column bottoms. The term does not include a co-product that is produced for the general public's use and is ordinarily used in the form it is produced by the process.
 - 4) A material is "reclaimed" if it is processed to recover a usable product, or if it is regenerated. Examples are recovery of lead values from spent batteries and regeneration of spent solvents.
 - 5) A material is "used or reused" if it is either:
 - A) Employed as an ingredient (including use as an intermediate) in an industrial process to make a product (for example, distillation bottoms from one process used as feedstock in another process). However, a material will not satisfy this



Mostardi Platt

Environmental

1520 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-993-2100
Fax 630-993-9017
www.mostardiplattenv.com

August 28, 2002

Ms. Margaret A. Coughlin
Dickerson Wright PLLC
38525 Woodward Avenue
Suite 2000
Bloomfield Hills, Michigan 45304

Re: RRG/Clayton Chemical Superfund Site

Dear Meg:

As discussed with you in our recent phone conversation, MOSTARDI PLATT ENVIRONMENTAL (MPE) is retained on a continuous basis to manage the environmental matters of the Lyon Metal Products, L.L.C., Montgomery, Illinois.

I would appreciate the following information, if available, and contact individuals:

- Group designated Project Coordinator and qualifications, and if approved by USEPA
- Chairman and members of the Group Steering Committee
- Chairman and members of the Group PRP Search Committee
- Chairman and members of the Technical Strategy Work Plan Committee

As per our discussion, I would be interested in participating and contributing to the technical and PRP Search Committees to maximize the PRP base and cost effectiveness.

Thanks again for your cooperation.

Sincerely,

MOSTARDI PLATT ENVIRONMENTAL

Philip J. Molé
Vice President

PJM/ld

cc: Lyon Metal Products
Peter Washington
Doug Harrison



Mostardi Platt

Environmental Solutions

1520 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-993-2100
Fax 630-993-9017
www.mostardiplatten.com

September 27, 2002

Mr. William E. Muno
Director Superfund
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Lyon Metal Products, L.L.C., Montgomery, Illinois
RRG/Clayton Chemical Co.
Superfund Site
1 -- Mobile Avenue, Sauget, Illinois, St. Clair County

Dear Director Muno:

Please be advised that MOSTARDI PLATT ENVIRONMENTAL (MPE) is retained to manage the environmental affairs of Lyon Metal Products, L.L.C., 420 North Main Street, Montgomery, Illinois 60538 as it concerns the subject matter.

A review of the Clayton Chemical site/R.R.G. final volumetric ranking dated February 25, 2002, lists the following corporations as liable generators:

- L.C. #640 Purethane - 155,202 gallons
- L.C. #10 AAA Distribution - 267,637 gallons
- L.C. #40 Ambassador Building - 23,232 gallons
- L.C. #44 K&R Wood Products - 10,197 gallons

A revised list dated May 8, 2002, does not include these as PRPs. Please advise the circumstances for de-listing. Your prompt response is appreciated.

Sincerely,

MOSTARDI PLATT ENVIRONMENTAL

Philip J. Molé

Philip J. Molé
Vice President

PJM/ld

cc: Ms. Janet Haynes

Via Facsimile 312-886-1515 and
U.S. Mail



Mostardi Platt

Environmental

1520 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-993-2100
Fax 630-993-9017
www.mostardiplattenv.com

September 30, 2002

Ms. Janet Haynes
Environmental Manager
NASCOTE
c/o 375 Magna Drive
Aurora, Ontario
Canada L4G7L6

Re: Liquids Removal Phase I PRP Technical Committee
RRG/Clayton Chemical Site, Sauget, Illinois

Dear Ms. Haynes:

Please be advised that MOSTARDI PLATT ENVIRONMENTAL (MPE) represents Lyon Metal Products L.L.C., Montgomery, Illinois in environmental matters. In this capacity we have reviewed and evaluated the request for proposal (RFP) submitted by O'Brien & Gere (OBG) as it concerns the subject facility. We would like to suggest the following:

- The preparation of the OBG scope of work should include and consider the on-site treatment of approximately 820,000 gallons of non-hazardous oil/water. The use of a centrifuge and/or decanting separation system can substantially reduce the PRP costs of off-site disposal by approximately 80%. The reclaim oil sold to re-refiners, the water discharged to the Sauget sewage treatment plant (POTW) by permit.
- The liquid waste utilized as a supplemental fuel meets the criteria of BTU/lb to qualify for use in industrial boilers or permitted cement kiln combustion. It is estimated approximately 60,000 gallons exist in the inventory file records reducing PRP disposal costs by approximately 60%.
- The record indicates sufficient compounds of concern (COC) sample analysis has been conducted by the multi-agency inspections reports by (USEPA, IEPA) of 1997 and the R. Weston-Contractor to U.S. EPA report Start Contract #68-W-00-119 of September 6, 2001 for the proper vessel identification. I do not believe additional sampling is required. This will expedite the process, reduce PRP costs and time schedules. Tank inspection and inventories have been inspected by U.S. EPA, IEPA, Envirovac/Wareco reports to identify contents with the record and site plan for ignitable, incompatible, reactive and corrosives waste containers. This will substantially reduce costs of the S.O.W.

NASCOTE

September 30, 2002

Page 2

- MPE firmly believes that due to the plus 50 years of environmental impairment at the site, plus the fact that there are 14 superfund sites on the perimeter and adjacent to it, that it is incumbent upon the lead agency to conduct an engineering evaluation/cost analysis (EE/CA) of removal alternatives for the site fully considering the collar facilities joint impact.
- MPE believes the above comments and recommendations are consistent with the spirit and intent of the RCRA reforms to streamline the investigation/closure process by focusing directly on the primary risk factors for corrective action, reducing overall PRP costs. In conformance with Title 42 USC and Section 300.415 of the National Oil Hazardous Substances Pollution Contingency Plan (NCR) 40 CFR.
- It is suggested that OBG increase its insurance for general and professional liability to include a minimum of 5 million each, and indemnification of the performing PRP group members.
- The OBG fee schedule and hours appears to be excessive - suggest we seek competitive bids.

Please contact me should you have any questions at (630) 993-2158.

Very truly yours,

MOSTARDI PLATT ENVIRONMENTAL



Philip J. Molé P.E.
Vice President

PJM/ld

cc: R.P. Washington, Lyon Metal Products
D. Harrison, Lyon Metal Products
J. Goselin, Lyon Metal Products
Meg Coughlin, Dickerson Wright
PRP Technical Committee

Via facsimile and
U.S. Mail

MOSTARDI PLATT ENVIRONMENTAL

1520 Kensington Road, Suite 204

Oak Brook, IL 60523-2139

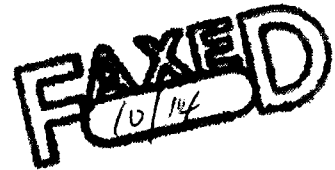
630-993-2100

Fax: 630-993-9017

FAX TRANSMITTAL SHEET

To: Margaret A. Coughlin
Company: Dickerson Wright PLLC
Phone: 248-433-7200
Fax: 248-433-7274

From: Philip J. Mole' Sr.
Phone: 630-993-2100
Fax: 630-993-9017 or 630-993-1941
E-Mail: PMoleSr@mostardipltattenv.com
Date: 10/14/2002
Total pages: 1 (including cover sheet)



If you have not received the total number of pages as indicated above, please call me.

A physical copy of this fax ~~will~~ will not be mailed.

Date FAX sent: 10/14 Time: _____ By: _____

Message:

MPE is interested in submitting a proposal for "turn key" environmental management and liquids cleanup. Over 30 years experience - cost-effective closures.

cc: Janet Haynes, 905-726-7295 (fax)



Mostardi Platt

Environmental

1520 Kensington Road, Suite 204
Oak Brook, Illinois 60523-2139
Phone 630-993-2100
Fax 630-993-9017
www.mostardiplattenv.com

October 21, 2002

Ms. Margaret A. Coughlin
Dickerson Wright PLLC
38525 Woodward Avenue
Bloomfield Hills, Michigan 48304

Dear Meg:

As per our phone discussion of October 17, 2002, this will confirm that Lyon Metal Products is fully committed to cooperating with the PRPs and USEPA concerning the RRG/Clayton Chemical site, Sauget, Illinois.

We do feel that credits should be issued to Lyon for the recycled materials returned and the fuel blending product which was utilized for energy conservation and certificates of destruction rendered. This effect was in the true spirit and intent of the RCRA act. Your consideration and support is respectfully requested. Please be advised that I personally have extensive knowledge of the facility and region and will contribute time and resources to the PRP search technical committees to substantially reduce costs and expedite the Phase I liquids removal.

Thank you for your consideration.

Sincerely,

MOSTARDI PLATT ENVIRONMENTAL

Philip J. Molé

Philip J. Molé P.E. C.H.M.M.
Vice President

PJM/lid

cc: Ms. Janet Haynes, NASCOTE
Mr. Patrick Kinally

DRUMS																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
-------	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

DRUMS												PAGE 1
STORAGE AREA	WASTE DESCRIPTION	QUANTITY	UNIT COST	METHOD OF TREATMENT						COST	REMARKS	
Drum Building	Acids & Alkalies	25	\$250.00	Aqueous Treatment						\$8,250.00		
Drum Building	Hazardous D, F Codes	48	\$210.00	Fuel Blending/BIF Fuels						\$10,080.00		
Drum Building	Non-Hazardous	34	\$200.00	Fuel Blending/Substitute D						\$6,800.00		
Drum Building	Mercury (Hg)	1	\$460.00	Recovery						\$460.00		
Drum Building	Oxidizer	1	\$250.00	Reduction						\$250.00		
Drum Building	Perchloroethylene	11	\$250.00	Reclamation						\$2,750.00		
Lab	Sample Compilations	1	\$500.00	Incineration						\$500.00		
Drum Transportation		121								\$27,090.00		
SUBTOTAL										\$3,000.00		
										\$30,090.00	Average cost per drum: \$248.68	
BULK LIQUIDS (Hazardous)												
T-RC	Blended Fuels	7,140	\$1.75	Incineration						\$12,495.00	Low BTU; High Water	
T-52	Blended Fuels	3,483	\$1.75	Incineration						\$6,095.25	High %Cl	
T-51	D001 Wastewater	6,433	\$1.75	Incineration						\$11,257.75	High Water	
T-46	Dilute Perchloroethylene	1,392	\$1.75	Incineration						\$2,436.00	Low BTU; High %Cl	
S-1	F002 Wastewater	8,793	\$1.75	Incineration						\$15,387.75	No BTU; High Water	
S-2	D001 Wastewater	9,206	\$1.75	Incineration						\$16,110.50	No BTU; High Water	
S-3	MEK	4,308	\$0.45	BIF fuels						\$1,937.70	High BTU; Low Water	
S-4	D001 Wastewater	7,908	\$1.75	Incineration						\$13,839.00	Low BTU; High Water	
S-8	Dilute Perchloroethylene	3,800	\$1.75	Incineration						\$6,650.00	High %Cl	
SUBTOTAL		52,461								\$86,208.95		
BULK LIQUIDS (Non Hazardous)												
S-5	OII/Water	9,029	\$0.38	Separation/Stripping						\$3,431.02		
T-11	OII/Water	22,747	\$0.38	Separation/Stripping						\$8,643.86		
T-12	OII/Water	26,384	\$0.38	Separation/Stripping						\$10,029.72		
T-13	OII/Water	26,247	\$0.38	Separation/Stripping						\$9,973.86		
T-14	OII/Water	22,976	\$0.38	Separation/Stripping						\$8,730.88		
T-33	OII/Water	4,537	\$0.38	Separation/Stripping						\$1,724.06		
T-37	OII/Water	5,625	\$0.38	Separation/Stripping						\$2,137.50		
T-17	OII/Water	5,437	\$0.38	Separation/Stripping						\$2,066.06		
T-41	OII/Water	5,397	\$0.38	Separation/Stripping						\$2,050.86		

DRUMS																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																			
-------	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Exhibit A

Table 4-9 (Continued)

DRUM DOCK BUILDING INVENTORY - DRUM CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SALGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

Generator	PDS NO.	Bay Number	Description	IEPA #	Comments
ADM Vitamin E	2235A	1	Hazardous Solids	77	passed flammable
Republic	2219A	1	Hazardous Solids	7	
Republic	2219A	1	Hazardous Solids	8	
RPS	2233A	2	Toxic Solids	78	
ADM Corn Sweetener	2174A	3	Hazardous Solids	25	
Komatsu	2220B	3	Hazardous Solids	37	
Komatsu	2220B	3	Hazardous Solids	29	
Chemetco	2191A	6	Hazardous Solids	47	
Nascote	2242A	13	Hazardous Solids	95	
Nascote	2242A	13	Hazardous Solids	100	
Nascote	2242A	13	Hazardous Solids	99	
Nascote	2242A	13	Hazardous Solids	98	
Nascote	2242A	13	Hazardous Solids	97	
Nascote	2242A	13	Hazardous Solids	96	
Nascote	2242A	13	Hazardous Solids	95	
Nascote	2242A	13	Hazardous Solids	94	
Nascote	2242A	13	Hazardous Solids	93	
Nascote	2242A	13	Hazardous Solids	92	
Nascote	2242A	13	Hazardous Solids	91	
Nascote	2242A	13	Hazardous Solids	89	
Nascote	2242A	13	Hazardous Solids	88	
Nascote	2242A	13	Hazardous Solids	87	
Nascote	2242A	13	Hazardous Solids	86	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	
Nascote	2242A	13	Hazardous Solids	Over pack	

Table 4-9 (Continued)

DRUM DOCK BUILDING INVENTORY - DRUM CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SAUGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

Generator	PDS NO.	Bay Number	Description	IEPA #	Comments
CIPS	1114A	13	Non Haz Ethylene Glycol	110	
CIPS	1114A	13	Non Haz Ethylene Glycol	109	
CIPS	1114A	13	Non Haz Ethylene Glycol	108	
CIPS	1114A	13	Non Haz Ethylene Glycol	107	
CIPS	1114A	13	Non Haz Ethylene Glycol	113	
CIPS	1114A	13	Non Haz Ethylene Glycol	114	
CIPS	1114A	13	Non Haz Ethylene Glycol	115	
CIPS	1114A	13	Non Haz Ethylene Glycol	116	
Nonthrop	1207A	13	Non Haz Ethylene Glycol	112	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	15	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	16	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	17	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	18	
ADM Corn Sweetners	1874C	2	Non Haz Semi-Solids	20	
ADM Corn Sweetners	1619A	3	Non Hazardous Solids	27	
ADM Mechanical	1669D	4	Non Hazardous Solids	43	
Nascote	2243C	7	Non Hazardous Solids	66	
Sligo	1784A	7	Non Hazardous Solids	67	
National Graphics	2033D	3	Non Hazardous Solids	64	
National Graphics	2033B	3	Non Hazardous Solids	65	
National Graphics	2033D	3	Non Hazardous Solids	69	
ADM East	2040A	1	Non Hazardous Solids	6	
ADM Fabrication	1370A	2	Oxidizing Solid	Not found	Not Found
ADM Fabrication	1370A	13	Oxidizing Solid	14	
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	49	PERC LOT
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	50	PERC
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	51	Maybe extremely haz
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	52	

Table 4-9 (Continued)

DRUM DOCK BUILDING INVENTORY - DRUM CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SALGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001

Generator	PDS NO.	Bay Number	Description	IEPA #	Comments
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	58	PCE
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	59	
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	60	
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	61	
RRG Internal	Internal	6	Perc Solids from Reclaim/Consol	62	
St. Louis Parks	633B	4	Soap Water	41	
National Graphics	2032A	13	Sodium Hydroxide	11	
Petrolite	2119A	13	Sodium Hydroxide	30	
ADM Fabrication	1367D	13	Sodium Nitrate	23	
RRG	not labeled	3	Waste Solids	no label	
RRG	not labeled	3	Flammable	no label	
RRG	not labeled	3	Waste Solids	no label	
Label Scratched	Can't Read	3	Hazardous Solid	no label	
RRG	not labeled	6	Sludge Accumulation	48	not labeled
National Graphics	2032B	6	Nitric Acid	63	5 gallon bucket
National Graphics	2032D	7	Non Hazardous Liquid	68	
Generator Unknown	2070A	8	Flammable Liquid	no label	
RRG	not labeled	south room	Flammable Liquid	122	5 gallon bucket
RRG	not labeled	south room	Floor Dry	121	1 gallon
ADM Fabrication	1367B	13	Caustic Soda	4	1 gallon
National Graphics	2032A	13	Sodium Hydroxide	12	
RRG	1279A	collection area	Sampling Jars	Not found	Collection Area
RRG	NA	see comments	Approximately 2,536 Sampling Jars in boxes and jars	Not found	Located on southwest/southeast wall.

Key PDS NO. = A number found on the drums and corresponds to RRG weekly drum inventory

Table 4-11

**BOILER GARAGE BUILDING INVENTORY - TANK, DRUM, CONTAINER SURVEY
CLAYTON CHEMICAL SITE ANALYSIS
SALGET, ST. CLAIR COUNTY, ILLINOIS
JUNE 5, 2001 TO JUNE 7, 2001**

TYPE OF MATERIAL	NUMBER OF ITEMS	Comments
Unknown Solid	1	5 gallons
Miscellaneous Boiler Chemicals	1	35 gallons
Miscellaneous Boiler Chemicals	1	55 gallons
Fiber Drum Solid Desiccate	1	35 gallons
Drum of Sodium Hexamethphosphate	1	35 gallons
Boiler Feed Water Treatment	1	20 gallons
Lube Oil Dispenser	1	Unknown
Bags Water Softener Salt	25	Bags
Oxygen Scavenger Cornsive	1	20 gallons
Mole Sevc	13 Drums	All Full
Sodium Bisulfate	1	liquid
Isopropanol	1	3/4 full UN1219
Morpholine	1	drum
Spent Carbon	6	used for absorption
Caustic Substances	35	in plastic buckets. In over-pack. For cleaning
10% Sulfuric Acid	1	drum
Robinol N-10	1	Non-Haz
Ammonium Hydroxide	1	drum
Dry Solids	1	drum
Oakite boiler treatment	1	appears to be leaking - busted
Unknown	1	could not open/possible hazardous. No markings
Caustic Substances	3	in plastic buckets. In over-pack. For cleaning
Boiler treatment	2	5 gallons. Half full
Cooling tower treatment	1	5 gallons

*** TX REPORT ***

TRANSMISSION OK

TX/RX NO 4010
CONNECTION TEL 813128860747
SUBADDRESS
CONNECTION ID
ST. TIME 09/17 12:22
USAGE T 00'16
PGS. SENT 1
RESULT OK

FAXED**MOSTARDI PLATT ENVIRONMENTAL***1520 Kensington Road, Suite 204**Oak Brook, IL 60523-2139**630-993-2100**Fax: 630-993-9017***FAX TRANSMITTAL SHEET**

To: Tom Turner - Asst. Regional Council
Company: U.S. EPA - Superfund FOIA Request
Phone: 312-886-6613
Fax: 312-886-0747

From: Phil Mole Sr.
Phone: 630-993-2158
Fax: 630-993-9017
E-Mail: PMoleSr@mostardipltattenv.com
Date: 09/17/2002
Total pages: 1 (including cover sheet)

If you have not received the total number of pages as indicated above, please call me.

A physical copy of this fax **will/will not** be mailed.

Date FAX sent: _____ Time: _____ By: _____

Message:

Re: Clayton/Chemical RRG Superfund site
Sauget II. - FOIA request

MOSTARDI PLATT ENVIRONMENTAL

1520 Kensington Road, Suite 204

Oak Brook, IL 60523-2139

630-993-2100

Fax: 630-993-9017

FAXED

FAX TRANSMITTAL SHEET

To: **Tom Turner - Asst. Regional Council**
Company: U.S. EPA - Superfund FOIA Request
Phone: 312-886-6613
Fax: 312-886-0747

From: **Phil Mole Sr.**
Phone: 630-993-2158
Fax: 630-993-9017
E-Mail: PMoleSr@mostardipltatenv.com
Date: 09/17/2002
Total pages: 1 (including cover sheet)

If you have not received the total number of pages as indicated above, please call me.

A physical copy of this fax **will/will not** be mailed.

Date FAX sent: _____ Time: _____ By: _____

Message:

Re: Clayton/Chemical RRG Superfund site
Sauget, IL - FOIA request
Rep. Lyon Metal Products - (PRP)

Please fax to my attention copies of the engineering evaluation (Cost) (EEKA) of removal alternatives for the liquid phase - including the sampling and analysis data - describing location of samples - all vessels.

Dates?

REPRESENTATIVE REGION V EXPERIENCE

Client	Location	Project Highlights
Collins & Aikman	Beardstown, IL	Remedial design/remedial action (RD/RA) services for ground water that was impacted with volatile organic compounds (VOCs) from manufacturing operations. Site-specific QAPP and HASP, and monitoring and sampling plan for ground water that was impacted with volatile organic compounds (VOCs) from manufacturing operations. Coordination with IEPA.
Chrysler Corporation PRP	Belvidere, IL O BRIEN & GERE CONTRACTORS	Turnkey design and construction of an <i>ex situ</i> soil treatment cell utilizing bioventing as the remediation technology to enhance the natural biodegradation process of VOCs and SVOCs present in the soil.
Venture	Moline, IL	Ground water remediation and monitoring project. The ground water remediation consisted of a pump and treat system.
Honeywell, Inc.	Vincennes, IN	Contract administration, QA/QC for quarterly sampling, preparation of work plan, HASP, QAPP, and biota sampling at former battery manufacturing facility. Project includes extensive coordination with EPA Region 5 and Indiana Department of Environmental Management.
TRW	Shelbyville, IN	Identified separate ground water contaminant plumes associated with each facility. Ground water recovery, conveyance, and treatment systems were designed and installed for both facilities, with performance and effectiveness monitored quarterly and annually. Compliance reports are submitted to the Indiana Department of Environmental Management (IDEM).
TRW	Lafayette, IN	Ground water recovery and treatment program with an air stripper, still successfully operating. Soil treatment with a soil vapor extraction system. VOC concentrations reduced from 640 ppm to 20 ppm.
Alcan	Terra Haute, IN	Full-scale remediation program. This work included developing a Remedial Work Plan and Closure Plan and submitting them to IDEM for approval; completing additional pilot testing of the proposed remedial systems; design and construction of the remedial system; and startup and operation of the system.
TRW	Minerva, OH	Remedial investigations, feasibility studies, preliminary and final design and construction management services in response to soil, surface water and ground water contamination at CERCLA site. The program included surface remediation of PCBs from on-site ditches, swales, dumping areas and a holding pond.

